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Via ECF

Hon. Brian M. Cogan, U.S.D.J.
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jose Panora v. Deenora Corp., et al., E.D.N.Y. Case No. 19-CV-7267 (BMC)

Your Honor:

We represent Defendants in the above-referenced matter. This letter is respectfully submitted to request a 5 page enlargement of the 25 page limitation applicable to Defendants' memorandum of law in opposition to Plaintiff's attorney's fees motion. 30 total pages are necessary to satisfactorily respond to Plaintiff's attorney's fees motion in view of the unusual circumstances of this case, including multiple instances of sanctioned misconduct by Plaintiff's counsel and numerous deficiencies in Plaintiff's fee application materials themselves. Defendants' opposition will necessarily need to closely examine each of these issues to effectively oppose Plaintiff's fee application and demonstrate that Plaintiff's sought fee is unreasonable as a matter of law. Given the excessive amount in fees and costs sought by Plaintiff at bar, Defendants would be severely prejudiced if the page limit is not enlarged to allow for a complete response.

We apologize for submitting this application for page limit enlargement on the final day that such an application can be made (our understanding is that the Court's rules specify that such application must be made 5 days or more from the related submission deadline, that today is the 5th day from the September 14th deadline, and that September 14th counts with respect to the Court's 5-day rule; to the extent our understanding is incorrect, we apologize, request the Court's indulgence, and hope the Court will forgive any oversight on our part). Please further note we have notified opposing counsel of our intent to seek a page limit enlargement, and that we have offered a reciprocal 5-page enlargement to Plaintiff's counsel on reply. Opposing counsel has not yet responded to the mutual page enlargement proposed. We thank the Court for considering this application.

KAUFMAN DOLOWICH & VOLUCK, LLP

By:



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cc: Plaintiff's counsel via ECF